Mr. Bruce Korenstra
Carriage, Inc.
70891 County Road 23
New Paris, IN 46553

Re: 039-15544
Second Administrative Amendment to
Part 70 039-6326-00456

Dear Mr. Korenstra:

Carriage, Inc., was issued a Part 70 permit on February 10, 1999, for a recreational vehicle (RV) and Class C motor home manufacturing plant. A letter requesting an administrative amendment was received on April 25, 2002. The changes requested related to the transfer of operational control of activities at Plant #2 (C&K Fiberglass Plastics, Inc.) to Better Way Products and Orbit Composites, Inc. According to 326 IAC 2-7-11(a)(4), an administrative amendment can be used for a "change in ownership or operational control of a source where the commissioner determines that no other change in a Part 70 permit is necessary, provided that a written agreement containing a specific date for transfer of a Part 70 permit responsibility, coverage, and liability between the current and new permittee has been submitted to the commissioner". The changes requested meet this requirement, therefore, pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions, **bold** to show additions):

1. The facility description in Section A.2 is amended to delete the emission units associated with Plant #2.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices in Carriage, Inc. (Plant #1) ~~and C & K Fiberglass Plastics, Inc. (Plant #2)~~:

Carriage, Inc. (Plant #1)
.....

~~C & K Fiberglass Plastics, Inc. (Plant #2)~~

~~Building 14~~

~~(1) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F1 and F2;~~

~~(2) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F3 and F4;~~

~~Building 15~~

~~(3) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter~~

~~control, and exhausting through two (2) stacks, identified as F8 and F9;~~

~~(4) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F6 and F7;~~

~~Building 16~~

~~(5) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F10 and F11;~~

~~(6) one (1) resin vacuum laminate coating application booth using roll coating system with a maximum capacity of 0.80 units per hour, and exhausting through three (3) stacks, identified as F15, F16 and F17; and~~

~~(7) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F12 and F13.~~

2. The description of insignificant activities in Section A.3 is modified as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

...

(4) the following welding activities, in Building 17, with particulate matter emissions equal to or below insignificant threshold of 5 pounds per hour:

(a) five (5) stick welding stations using carbon electrodes with a maximum consumption rate of 15 electrodes per hour;

(b) three (3) metal inert Gas (MIG) steel welding stations using carbon AWS A5.18 wire with a maximum consumption rate of 1.0 units per hour;

(c) five (5) MIG aluminum welding stations using type ER 4043 (aluminum) wire with a maximum consumption rate of 1.25 units per hour; and

~~(5) three (3) natural gas-fired make-up air units in Plant #2, identified as H1A, H2A and H3A, each with a heat input rate of 3.025, 3.025 and 3.85 mmBtu/hr, respectively.~~

3. The facility description in Section D.1 is amended to delete the emission units related to Plant #2:

Facility Description [326 IAC 2-7-5(15)]
Carriage, Inc. (Plant #1)

.....

(4) miscellaneous VOC containing aerosol spray adhesives and handwipe solvents with the following maximum coating rates:
(a) 0.25 units per hour in Building 3;
(b) 0.25 units per hour in Building 5;
(c) 0.75 units per hour in Building 7;

(d) 0.25 units per hour in Building 9;
(e) 0.25 units per hour in Building 22.

~~C & K Fiberglass Plastics, Inc. (Plant #2)~~
~~Building 14~~

~~resin laminate coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F1 and F2;~~

~~(2) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F3 and F4;~~

~~Building 15~~

~~(3) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F8 and F9;~~

~~(4) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F6 and F7;~~

~~Building 16~~

~~(5) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F10 and F11;~~

~~(6) one (1) resin vacuum laminate coating application booth using roll coating system with a maximum capacity of 0.80 units per hour, and exhausting through three (3) stacks, identified as F15, F16 and F17; and~~

~~(7) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F12 and F13.~~

4. The Condition D.1.11 is amended as follows:

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (A) through (G) below. Records maintained for (A) and (B) shall be taken daily and records maintained for (C) through (G) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.3.

For metal coating operations at the source:

(A) The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(B) A log of the dates of use.

For VOC emissions of ~~Plant #2 (Building 14, 15 and 16) and~~ Buildings 7 and 17:

(C) A log of the dates of use;
(D) The volume weighted VOC content of the coatings used for each month.
(E) The cleanup solvent usage for each month.

(F) The total VOC usage for each month.
(G) The weight of VOCs emitted for each compliance period.

5. References to the Office of Air Management (OAM) are changed to Office of Air Quality (OAQ).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Elkhart County
U.S. EPA, Region V
Northern Regional Office
Elkhart County Health Department
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Carriage, Inc.
210 Wabash Street
Millersburg, Indiana 46543

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6326-00456	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 10, 1999

First Significant Source Modification: 039-11304 Issuance Date: July 7, 2000
First Administrative Amendment: 039-12420 Issuance Date: July 26, 2000

Second Administrative Amendment: 039-15544	Pages Modified: 6, 7, 7a, 30, 33
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

(c) 0.75 units per hour in Building 7;
(d) 0.25 units per hour in Building 9;
(e) 0.25 units per hour in Building 22; and

(5) one (1) wood waste fired boiler in Building 20, with a fuel consumption rate of 750 pounds per hour and a rated capacity of 4.0 mmBtu/hr, equipped with a single 42" diameter cyclone for particulate matter emission control, and exhausting through one (1) stack, identified as #20.

Building 18

(6) One (1) woodworking operation, consisting of various woodworking tools, known as WW, equipped with a cyclone and baghouse connected in series, exhausted inside the building, capacity: 800 pounds of wood per hour.

Building 18A

(7) Three (3) surface coating booths, known as SC1, SC2 and SC3, equipped with six (6) HVLP spray guns and dry filters for particulate overspray control, exhausted to stacks F1, F2 and F3, respectively, capacity: 44.05 cabinet doors per hour, each.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) two (2) boilers in Building 5 each rated at 0.85 and 0.3 mmBtu/hr, and four (4) boilers, known as 1 through H4, rated at 0.15 million British thermal units per hour, each;

(2) degreasing operations that do not exceed 145 gallons per 12 months;

(3) the following woodworking activities with particulate matter emissions equal to or below insignificant threshold of 5 pounds per hour:

(a) one (1) cyclone dust collection system controlling two (2) chop saws and one (1) drill press in Building 3;

(b) one (1) cyclone dust collection system controlling three (3) chop saws, one (1) table saw, two (2) routers, two (2) band saws, two (2) radial saws, one (1) shaper, one (1) belt sander, and one (1) drill press in Building 7;

(c) one (1) cyclone and baghouse dust collection system controlling nine (9) chop saws, three (3) band saws, one (1) sander, and one (1) mitre saw in Building 9;

(d) one (1) cyclone dust collection system controlling two (2) chop saws, one (1) radial arm saw, and one (1) band saw in Building 12;

(e) one (1) cyclone and baghouse dust collection system controlling two (2) chop saws, one (1) radial arm saw, one (1) belt sander, one (1) grinder, one (1) router, one (1) drill press, one (1) band saw, and one (1) table saw in Building 22;

(4) the following welding activities, in Building 17, with particulate matter emissions equal to or

below insignificant threshold of 5 pounds per hour:

(a) five (5) stick welding stations using carbon electrodes with a maximum consumption rate of 15 electrodes per hour;

(b) three (3) metal inert Gas (MIG) steel welding stations using carbon AWS A5.18 wire with a maximum consumption rate of 1.0 units per hour;

(c) five (5) MIG aluminum welding stations using type ER 4043 (aluminum) wire with a maximum consumption rate of 1.25 units per hour; and

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(1) It is a major source, as defined in 326 IAC 2-7-1(22).

(2) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Carriage, Inc. (Plant #1)

Building 8

(1) one (1) airless paint spray booth with a maximum capacity of 0.5 units per hour, using dry filters as overspray particulate matter control, and exhausting through one (1) stack, identified as #92;

Building 12

(2) one (1) airless counter top assembly adhesive spray booth, with a maximum capacity of coating 10 units per hour, using dry filters as overspray particulate matter control, and exhausting through two (2) stacks, identified as #90 and #91;

Building 17A

(3) one (1) high pressure air-assisted paint spray booth, capable of coating 2.0 units of metal frame per hour, using dry filter banks as overspray particulate matter control and exhausting at one (1) stack, identified as 17A; and

(4) miscellaneous VOC containing aerosol spray adhesives and handwipe solvents with the following maximum coating rates:
- (a) 0.25 units per hour in Building 3;
- (b) 0.25 units per hour in Building 5;
- (c) 0.75 units per hour in Building 7;
- (d) 0.25 units per hour in Building 9;
- (e) 0.25 units per hour in Building 22.

emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (A) through (G) below. Records maintained for (A) and (B) shall be taken daily and records maintained for (C) through (G) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.1 and D.1.3.

For metal coating operations at the source:

(A) The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(B) A log of the dates of use.

For VOC emissions of Buildings 7 and 17:

(C) A log of the dates of use;

(D) The volume weighted VOC content of the coatings used for each month.
(E) The cleanup solvent usage for each month.
(F) The total VOC usage for each month.
(G) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.